






ST HELENA COMMUNITY WIND FARM DEVELOPMENT EIA ISSUES AND RESPONSE REPORT

Stakeholders who contributed issues range across all sectors of society. A full record of every issue raised is available from the public participation offices. Many stakeholders raise the same issue. This list of issues lists all the issues raised by I&APs throughout the study area. In many instances, an issue raised about a particular alternative, is also applicable to other alternatives. The name, affiliation and date of the commentator are also indicated. The affiliation, where indicated, of the person who raised the comment is indicated; as it was at the time the comment was raised.

✉ - mail; 💻 - email; 📠 - facsimile; ☎ - telephone; 📄 - comment sheet

Respondent & organisation	Issue / concern*	Date	Means of Communication	Comment / Query	Response
Issues and concerns raised during the EIA Notification period					
Doretha Kotze Town and Regional Planner West Coast District Municipality	Request for registration.	31 Mar 2011	💻	I would like to register the WCDM as an I&AP for the proposal.	I&AP was registered accordingly.
Mike Kantey Private Individual	Request to be removed from the I&AP Database.	30 Mar 2011	💻	Request to be removed from the I&AP Database.	I&AP was removed accordingly.

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Melanese Schippers Western Cape Department of Environmental Affairs and Development Planning	Provision of EIA Documentation to WC DEADP for commenting.	31 Mar 2011		Please be advised that copies of all documents submitted to DEA must be submitted to this Department for commenting purposes.	Thank you for your email dated 31 March 2011. Your comment has been noted accordingly and Arcus GIBB will ensure the Western Cape Department of Environmental Affairs and Development Planning receives all documentation accordingly.
Lizelle Stroh Obstacle Specialist SA Civil Aviation Authority	Request for completion of Civil Aviation Authority wind Farm Application and Provision of proposed site co-ordinates.	30 Mar 2011		Please complete the wind farm application, supply us with the shape file of the farm, and apply WGS 84 co-ordinates of the turning points of farm boundaries.	Thank for your email received, dated 30 March 2011. Your request has been noted and the relevant documentation requested will be provided accordingly.
Keith Harrison West Coast Bird Club	Request for registration Initial comment	1 Apr 2011		I would like to register the West Coast Bird Club (WCBC) as an Interested Affected Party (IAP) to the above project. The WCBC currently have no objections to the project (previously discussed with the AIA). However the proposed site borders upon two other proposed wind farm sites and the possible cumulative impact upon the area must be taken into account during the Scoping Phase. It should also be noted that 'West Coast No.1' has just received approval and proposes to enter the Eskom Grid at the same sub-station, is there enough capacity to accommodate both projects?	I&AP was registered accordingly. Comment regarding other projects within the study area noted. Currently there is an existing 66 kV powerline running alongside the property of the farm Langklip, which would be sufficient enough for the St Helena Community Wind Farm to connect into. Due to the proposed establishment of a few other wind farms within the study area, there may however be the need to upgrade the powerline to a 132 kV line or larger. The upgrade of this line should it be required will be for Eskom to do, as it is an Eskom powerline. In order to

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					connect the St Helena Wind Farm to the 66 kV powerline, a substation will be required and is included within the EIA for the St Helena Community Wind Farm Development application.
Rhett Smart Conservation Officer: Cape West Coast Biosphere	Request for registration	05 Apr 2011		Please can you register the Cape West Coast Biosphere Reserve as Interested and Affected Parties for this project and ensure we receive all documentation and are kept well informed. Please register the people: Chantel van der Merwe, Rhett Smart.	I&AP and recommended individuals were registered accordingly.
Andy Gubb WESSA	Background to the proposed project and the proposed applicant.	01 Apr 2011		Enquired as to the nature of the project, particularly with respect to it being defined as a community development and what that exactly means.	Just Energy (www.just-energy.org) is an organisation focused on working with low income communities to establish socially responsible clean energy enterprises, with the aim that these enterprises will generate social and economic benefits for the local community through new revenue streams generated by the projects. Just Energy is a not-for-profit business based in South Africa that is currently funded by the international development organisation, Oxfam and by a number of other like-minded organisations that share similar social objectives. Just Energy is assisting the Seeland Development Trust in the planning and development of a community wind farm.

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Alfred Rosant Laingville Resident	Community Benefits	5 May 2011	✉	The project will have many advantages for the community.	Comment noted.
Elize van Wyk Laingville Resident	Community Benefits	5 May 2011	✉	The project will provide job opportunities for the surrounding communities.	Comment noted.
Christelle van Wyk Laingville Resident	Community Benefits	5 May 2011	✉	Will benefit the community.	Comment noted.
Willem Meyer Laingville Resident	Community Benefits	5 May 2011	✉	Approve – good for the community.	Comment noted.
Joy Jordaan Laingville Resident	Community Benefits	5 May 2011	✉	Will save income / lower the cost of electricity.	Comment noted.
Delaryze Meyer Laingville Resident	Community Benefits	5 May 2011	✉	Approve.	Comment noted.
Celeste Alkaster Laingville Resident	Community Benefits	5 May 2011	✉	Project of this nature can only be beneficial for the community as a whole.	Comment noted.
Wilbert Meyer Laingville Resident	Community Benefits	5 May 2011	✉	Will be a good thing that will benefit the whole community.	Comment noted.
Freddie Rosant Laingville Resident	Community Benefits	5 May 2011	✉	Will develop community in a good way.	Comment noted.
Heidi Lindsay Smith Seeland Development Trust	Community Benefits	5 May 2011	✉	I do not know much about Wind Energy but I would like to know more, it looks very interesting. I want to know if Eskom is going to buy the electricity from the people because	The proposed project is planned to be developed under what is known as the Renewable Energy Feed-In Tariff (REFIT) Programme being implemented by the National Energy Regulator of South Africa (NERSA). Under this

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				the electricity is very expensive. And how soon is the project going to be finalized?	<p>programme, Eskom will purchase the electricity produced, at a price determined by NERSA and will feed this into the electricity grid accordingly. The profits realized from the project will go towards the Seeland Development Trust, who will look to use the profits to initiate community projects accordingly.</p> <p>The project can only begin once the Environmental Impact Assessment (EIA) Process has been completed and the project has been approved by the Department of Environmental Affairs (DEA). This process will most likely be completed during 2012. Once the EIA process has been completed, and should the project receive a positive authorization from the DEA, then the Developer can appoint a contractor accordingly to start with construction. The construction process should take between 6 months and a year to complete.</p>
Andy Gubb Centre for Environmental Rights	Community Benefits Sensitive Ecology	5 May 2011	✉	<p>How much of the proceeds go to the Seeland Development Trust and what portion of the community does the trust represent?</p> <p>How and when does the community start benefiting from the project?</p> <p>45% of the property is Strandveld, how does that conflict with the placement of</p>	The Seeland Development Trust is made up of 209 members. The immediate beneficiaries of the Trust include members of the St. Helena Bay community and its goal is to support social and economic development amongst the broader community of the Laingville township whose population is approximately 8000 people. They aim to utilize the land to unlock local

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				the turbines?	<p>development opportunities. The Trust responds to socio-economic conditions such as unemployment, poverty, skills shortage and Black Economic Empowerment.</p> <p>As a shareholder in the project, the Seeland Development Trust and community accordingly, will start to realize profits from the proposed project once it starts to pay dividends. In the first few years of the project the dividend flows may be relatively small, but this will increase over the first 5 years and will increase quite significantly as the project pays down its debt. The trust will also earn a guaranteed income from year one from the land lease that the project will have to pay.</p> <p>Currently the proposed placement of the turbines is planned to be on those areas of the farm which were previously used for cultivation but which did not succeed and is now considered as fairly degraded land. The EIA will aim to ensure, as far as possible, that placement of the turbines within protected vegetation or vegetation of high importance will not take place.</p>
Benjamin Faro Seeland	Community Benefits	5 May 2011	✉	I work for the Seeland Development Trust and I therefore support this project.	Comment noted.

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Development Trust					
Rachel Faro Seeland Development Trust	Community Benefits	5 May 2011	✉	<p>I think wind energy will be very efficient because it is cheaper, more environmentally friendly and it is cleaner than coal power etc.</p> <p>I think the biggest concern is the bird life, so this project should be done in a manner that takes that into account, but compared to other potential impacts associated with other projects I think this concern is minor.</p>	Comment noted.
Frikkie Frans Seeland Development Trust	Community Benefits	5 May 2011	✉	<p>This will be good for the community and for the Farm (Langeklip) as well as for Eskom. It will help everyone.</p> <p>I will be very happy once the project is complete and everyone in the community is excited about the project.</p>	Comment noted.
Mick Vermooten / Russell Sabor GVJ / SECC	Grid Connection	5 May 2011	✉	<p>Interested in how the project will be connected to the grid?</p> <p>The work should be subcontracted locally – the skilled people are available contrary to what the developers say. GVJ / SECC is a company dedicated to the upskillment of local labour.</p> <p>We are in favour of the project, the community wants work even if it is only temporary for 6 months.</p>	Currently there is an existing 66 kV powerline running alongside the property of the farm Langklip, which would be sufficient enough for the St Helena Community Wind Farm to connect into. Due to the proposed establishment of a few other wind farms within the study area, there may however be the need to upgrade the powerline to a 132 kV line or larger. The upgrade of this line should it be required will be for Eskom to do, as it is an Eskom powerline. In order to connect the St Helena Wind Farm to the 66 kV powerline, a substation will be

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					<p>required and is included within the EIA for the St Helena Community Wind Farm Development application.</p> <p>The comment regarding utilizing local labour is noted. As far as possible, the appointed contractors will be required to use local labour where it is available. This is a standard requirement of the Environmental Management Plan. The community is strongly advised to make known to the contractor prior to construction the availability of skills within the surrounding communities.</p>
Thabiso Mosia Laingville Resident	Financial Benefit	5 May 2011	✉	As a community member we are appreciative for such a development that will benefit our local community. In our community we only depend on fishing which is also facing many challenges. We welcome alternative economic projects in our area.	Comment noted.
Kathleen Lesch Laingville Resident	Community Benefits	5 May 2011	✉	As a resident I give my approval to this project. It will be an injection for the economy. I believe it will be of great benefit to the community.	Comment noted.
B. Alexander Laingville Resident	Community Benefits	5 May 2011	✉	This is a good opportunity for the residents who are unemployed and for the power which is often out.	Comment noted.
M Bester Laingville Resident	Community Benefits	5 May 2011	✉	This is a good opportunity since often in the winter there is no power.	Comment noted.
D. Talmakkies Laingville Resident	Community Benefits	5 May 2011	✉	I think this is a very good opportunity and I look forward to more information.	Comment noted.

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Desnise Ruiters / H. Ruiters Laingville Resident	Electricity Problems	5 May 2011	✉	There are currently too many problems with electricity in St Helena and the Government is doing nothing about it.	Comment noted.
Ivor Aekierman Laingville Resident	Community Benefits	5 May 2011	✉	This is a good opportunity for our community to get power from the windfarm.	Comment noted.
Daniel Williams Laingville Resident	Community Benefits	5 May 2011	✉	I believe this is a very good thing that the wind can be used to benefit the people in St Helena Bay. It will help a lot with the power. I say they must carry on.	Comment noted.
Michael Claasen Laingville Resident	Community Benefits	5 May 2011	✉	This is a very good place where they want to place the wind farm. Will be a very big opportunity for the community.	Comment noted.
Rojer Jordaan Laingville Resident	Community Benefits	5 May 2011	✉	This will better the lives for everyone. This is a good project for work opportunities. This will help us to save power. It also has little impact on the environment.	Comment noted.
Recardo Clark Laingville Resident	Community Benefits	5 May 2011	✉	Opportunity for the community to save electricity.	Comment noted.
Nigettine Pieters Laingville Resident	Community Benefits	5 May 2011	✉	The power is very expensive these days. If this project goes ahead hopefully we can pay less money.	Comment noted.
N.H. Links Laingville Resident	Project Timeframes Fauna and Flora Public Consultation Noise Impacts Community Benefits	5 May 2011	✉	How long will it take to complete the Environmental Impact Assessment? What type of fauna and flora has been identified? Proper communication with the community is essential.	A full EIA process for a project of this nature usually takes between 10 and 16 months, depending on feedback from the public participation process as well as feedback from the DEA. Currently the EIA process is approximately halfway, and it is anticipated to be completed by the end of the year. The construction process will only begin

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				<p>How much noise will come from the turbines and what will the effect be on Laingville?</p> <p>How many work opportunities will come from the project?</p> <p>To whom will the electricity be sold such that the community can benefit economically?</p>	<p>after the EIA and will take approximately 6 to 12 months.</p> <p>According to the most recent vegetation map produced of the country, the study area falls within one main vegetation type, Saldanha Granite Strandveld, which falls into the Fynbos Biome. Another vegetation type which also falls within the Biome, namely the Saldanha Flats Strandveld, occurs along the eastern boundary of the site. It is likely that the site could contain floristic elements derived from either of these vegetation types within remaining patches of natural vegetation.</p> <p>A landcover map of the study area indicates that a significant proportion of the site consists of cultivation. Based on these sources, it is probable that the study area has been impacted upon by cultivation and that any remaining vegetation is possibly not in pristine condition.</p> <p>The wind farm project will introduce noise sources into the local rural noise environment. The project's main noise sources and activities include:</p> <ul style="list-style-type: none"> • The construction equipment and activities during the construction phase; and

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					<ul style="list-style-type: none"> <li data-bbox="1599 341 2076 400">• The wind turbines during the operational phase. <p data-bbox="1599 432 2076 735">Noise associated with construction activities is generally of local extent and short duration. The construction operations are not expected to have any significant impact on the nearest local dwellings or residential communities. The noise impact, therefore, is expected to be of low significance and will be determined in detail in the EIA phase.</p> <p data-bbox="1599 767 2076 1046">Under normal operation, the wind turbines are not expected to generate any clearly audible tones or impulses that may cause community responses at lower noise levels. This, however, will be verified once the sound power spectrum data is available from the manufacturer and/or by direct measurements, if deemed necessary.</p> <p data-bbox="1599 1078 2076 1382">The number of jobs to be created by the proposed project have yet to be finalized. This detail will be assessed within the EIA phase of the report and presented in the draft EIA report for public review. Jobs will consist of temporary jobs during the construction phase of the project and permanent jobs during the operation phase of the wind farm. Another element to be</p>

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					<p>considered will be those jobs opportunities created indirectly through the profits realized from the wind farm.</p> <p>The proposed project is planned to be developed under what is known as the Renewable Energy Feed-In Tariff (REFIT) Programme being implemented by the National Energy Regulator of South Africa (NERSA). Under this programme, Eskom will purchase the electricity produced, at a price determined by NERSA and will feed this into the electricity grid accordingly. The profits realized from the project will go towards the Seeland Development Trust, who will look to use the profits to initiate community projects accordingly.</p>
Sariefa Laingville Resident	Community Benefits	5 May 2011	✉	As long as the project is an advantage to our people and children I am happy. If it is not a problem then it will be very good for us.	Comment noted.
Mitchelleen Jordaan Laingville Resident	Community Benefits	5 May 2011	✉	Saving of power is a good advantage for the community.	Comment noted.
Karl Lamoor Laingville Resident	Community Benefits	5 May 2011	✉	Building the windfarm will be good for the community. It is a good idea to generate power as the community struggles with power these days.	Comment noted.
Wilamiena Bounders Laingville Resident	Community Benefits	5 May 2011	✉	This is an advantage and good for the community. It also holds no threat to the community.	Comment noted.

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Sofia du Toit Laingville Resident	Community Benefits	5 May 2011	✉	We will be able to save money on electricity, as it is very expensive these days. It is also good as it may provide some jobs for the community.	Comment noted.
Patrica Arendse Laingville Resident	Community Benefits	5 May 2011	✉	Is an advantage of saving power in a community situated fish factories. Is a very seasonal base for your income. Half of the year the fish species are not available. Good for job creation.	Comment noted.
David Willemse Laingville Resident	Community Benefits	5 May 2011	✉	Windpower is an advantage in other areas so hopefully it will be an advantage for us. We also wish to keep the power going on as it is very expensive for us.	Comment noted.
Lucille Williams Laingville Resident	Community Benefits	5 May 2011	✉	It is a good advantage for the community, especially for people who work in the fish factories, who sometimes stop working. Will be a great advantage of power saving.	Comment noted.
Dina Engelbrecht Laingville Resident	Community Benefits	5 May 2011	✉	This is a good example for winter time when the power goes out. It is very good for our community especially for the many people who are jobless.	Comment noted.
Lerey Golrath Laingville Resident	Community Benefits	5 May 2011	✉	It is for us an advantage for people without jobs. It is a very good idea for us to save power and for people who have lots of power to buy.	Comment noted.
Ariel Abdol Laingville Resident	Community Benefits	5 May 2011	✉	Is an advantage for the unemployed. Many people have to burn candles in their houses, hopefully they won't have to any more.	Comment noted.
W.E. Mathiyse Laingville Resident	Community Benefits	5 May 2011	✉	For us poor people it is a good idea for the future. For me it is an advantage	Comment noted.

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D. Christians Laingville Resident	Community Benefits	5 May 2011	✉	It is good for us to save money. It is a good advantage for those of us without work.	Comment noted.
W. Kanow Laingville Resident	Community Benefits	5 May 2011	✉	It is better for us because we want to save power as electricity is expensive and not everyone can afford it.	Comment noted.
Rhett Smart Cape West Coast Biosphere	Comments on Draft Scoping Report	20 May 2011	💻	<p>Thank you for providing us with the opportunity to comment on the draft Scoping Report for the above proposed development.</p> <p>The Cape West Coast Biosphere Reserve (CWCBR) extends from the Diep River in the south to the Berg River in the north and inland to Malmesbury and therefore the proposed development is located within the CWCBR. One of the primary aims of the CWCBR is to implement sustainable development principles along the West Coast, in addition to integrating rapid growth with biodiversity and heritage conservation. In this regard, the CWCBR would like to comment as follows:</p> <p>Biodiversity and Ecology</p> <ul style="list-style-type: none"> The natural vegetation remaining on the sites consists of two endangered vegetation types (Saldanha Granite Strandveld and Saldanha Flats Strandveld) according to the CAPE Fine Scale Planning project for the Saldanha Municipality. According to the Fine Scale Planning 	<p>Biodiversity and Ecology Comments noted.</p> <p>A landcover map of the study area indicates that a significant proportion of the site consists of cultivation. Based on these sources, it is probable that the study area has been impacted upon by cultivation and that any remaining vegetation is possibly not in pristine condition.</p> <p>Currently the proposed placement of the turbines is planned to be on those areas of the farm which were previously used for cultivation but which did not succeed and is now considered as fairly degraded land. The EIA will aim to ensure, as far as possible, that placement of the turbines within protected vegetation or vegetation of high importance will not take place.</p> <p>The option of obtaining a peer review for the vegetation report will be tabled for discussion accordingly and feedback in regards to this matter will be provided to you once resolved.</p>


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				<p>project most of the site falls within a critical biodiversity area (CBA). No wind turbines should be permitted within a CBA.</p> <ul style="list-style-type: none"> • No infrastructure should be allowed in any areas of undisturbed natural vegetation, particularly vegetation identified as high conservation value. Although information in the Scoping Report is limited is apparent that the majority of the site consists of undisturbed vegetation. Any disturbance to natural vegetation must be compensated by offsite offsets. • The recommendations of the EIA phase botanical specialist study must be followed. • It is recommended that a specialist in the local flora be used for the EIA Phase botanical specialist report. The site is likely to contain numerous rare and endangered plant species and the specialist must be able to identify these species. The Scoping Phase report is based on desktop information. Otherwise, it is recommended that the botanical specialist report is subjected to peer review. • Appendix 5 of the ecological specialist report, indicating rare and endangered species from the surrounding area, is unlikely to be a 	<p>All recommendations of the flora specialist, as provided in the Scoping and EIA reports will be transferred across into the EMP accordingly and will be required to be adhered to in terms of the enforcement of that EMP.</p> <p>Appendix 5 of the flora report is merely a checklist of plant species previously identified through botanical surveys undertaken in the area. Appendix 1 was obtained from the South African National Biodiversity Institute for endangered plant species historically recorded as occurring in the area.</p> <p>Conservation of the remaining natural vegetation within the proposed site will be considered within the EIA phase of the project and discussed with Cape Nature accordingly. It is imperative that such initiatives are done in the correct manner.</p> <p>Concerns with regards to avifauna will be addressed through the specialist study employed for the proposed project. The issue of bird monitoring programmes and relevant mitigation measures are well known by GIBB, the specialist and the developer, and those measures legally required will be undertaken accordingly.</p>

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				<p>complete list (what is the source?).</p> <ul style="list-style-type: none"> It is further recommended that the data from local sources be used to supplement that of the specialist report. The Jacobsbaai CREW (Custodians of Rare and Endangered Wildflowers) group can visit the site to collect data. Based on neighboring sites there is likely to be numerous species of importance, with the granite boulders being a particularly important micro-habitat (e.g. <i>Lachenalia viridiflora</i>, <i>Pauridia longituba</i>). This habitat is under major threat along the St Helena ridge. It is recommended that the natural areas on the site be incorporated into a formal conservation area. Negotiations in this regard must be entered into with CapeNature and the CWCBR prior to the submission of the Final EIA Report. Should the project be authorised, a bird mortality monitoring programme should be implemented. Existing monitoring data for the area including for the other wind energy facilities proposed in the district must be used to inform the bird specialist study. The avifauna specialist report must also take into account the aquatic species that occur within the larger area, as the site could be an 	<p>Social, Economic and Planning Issues Comments noted.</p> <p>Just Energy (www.just-energy.org) is an organisation focused on working with low income communities to establish socially responsible clean energy enterprises, with the aim that these enterprises will generate social and economic benefits for the local community through new revenue streams generated by the projects. Just Energy is a not-for-profit business based in South Africa that is currently funded by the international development organisation, Oxfam and by a number of other like-minded organisations that share similar social objectives. Just Energy is assisting the Seeland Development Trust in the planning and development of a community wind farm.</p> <p>The Seeland Development Trust is made up of 209 members. The immediate beneficiaries of the Trust include members of the St. Helena Bay community and its goal is to support social and economic development amongst the broader community of the Laingville township whose population is approximately 8000 people. They aim to utilize the land to unlock local development opportunities. The Trust</p>


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				<p>important flyway between the wetlands of the area, which include some of the most important aquatic bird habitats in South Africa e.g. Berg River Estuary, Langebaan Lagoon. These species are likely to be more at risk than the sedentary species.</p> <ul style="list-style-type: none"> Rehabilitation of the quarry areas must be considered. <p>Social, Economic and Planning Issues</p> <ul style="list-style-type: none"> The wind farm is described as a community wind farm. The Social Impact Assessment must explain the exact nature of the relationship between Seeland Development Trust and Just Energy. This will be important in determining the social benefits of the project. The integration of the wind farm and the other activities of Seeland Development Trust on the property must also be detailed in order to have a broader picture of the operations on the site and the social benefits and impacts. The proclamation of a formal conservation area on site could integrate well with the environmental projects proposed by Seeland. The visual impact on the important tourism destinations of the Saldanha district is a significant factor, particularly due to the high elevation 	<p>responds to socio-economic conditions such as unemployment, poverty, skills shortage and Black Economic Empowerment.</p> <p>Specialist specific concerns will be addressed through the specialist studies employed for the proposed project. All comments / recommendations provided will be forwarded to the specialist accordingly to address in their detailed studies within the EIA phase of the project.</p> <p>Saldanha Bay Tourism, Berg River Tourism, West Coast District Municipality Tourism have been added to the I&AP database accordingly and details regarding the project sent through.</p> <p>The final placement of the wind turbines have not yet been determined at this stage. These positions will be made available during the EIA phase of the project, and will simultaneously be guided by the environmental specialist studies undertaken, to ensure the proposed final placements are done in the most strategic fashion possible.</p>


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				<p>of the site. These include Paternoster, Langebaan, St Helena Bay, Britannia Bay and Velddrift.</p> <ul style="list-style-type: none"> • The Scoping Phase visual impact assessment is purely speculative. The EIA Phase Report must include visual simulations on maps of the area, and include these for each of the proposed layout alternatives. • Public participation must include sensitive tourism receptors and all the relevant tourism agencies e.g. Saldanha Bay Tourism, Berg River Tourism, West Coast District Municipality Tourism. • Visibility of a silhouette against the horizon will result in a higher impact and must be taken account of. The visual impact assessment must use several simulations depending on location of the towers within the landscape. • The visual impact assessment must also take account of the impact of the flickering and retinal blur. • The economic impact on tourism in the area must be included in the Social Impact Assessment. • The noise impact assessment must also take into account the impact on domestic animals e.g. dairy cattle and other fauna. • The electromagnetic impact on 	

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				<p>wireless communication and related facilities must be assessed.</p> <ul style="list-style-type: none"> • The cumulative impact of all the wind facilities proposed for the district must be taken account of. This should also consider the minimum distance between adjacent wind facilities, including the approved West Coast One and proposed IPD Project Development (5 farms), Nooitgedacht and Eenzaamheid wind energy facilities. • The Scoping Report does not give any indication of the location of any of the wind energy infrastructure (turbines, cables, substation etc.). Detailed layouts including at least three alternatives should be included in the EIA Report. • The developer should consider the establishment of a facility for education of the public about alternative energy and climate change. • Consideration should also be given to the establishment of a fund for social and environmental initiatives in the local community, which could be undertaken in partnership with local community organisations. • An Environmental Monitoring Committee (EMC) must be established for both the construction and operational phases of the 	

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				development. The Cape West Coast Biosphere Reserve reserves the right to submit further comment on the Scoping Report following the submission of this comment	
Doretha Kotze Municipal Manager West Coast District Municipality	Comments on Draft Scoping Report	16 May 2011		<p>The Farm Langklip No. 47 is situated in the Saldanha Bay Municipal area south of the town St Helena Bay. The area is deemed 'highly restricted' in terms of the Strategic Environmental Assessment of Wind Farms in the Western Cape completed in 2010 by the Provincial Department of Environmental Affairs and Development Planning. This classification is based on the sites high degree of biodiversity, high visibility due to its topography, proximity to the coast and the Langebaanweg Air Force Base, as well as its proximity to both the R3999 and R27 scenic routes. The WCDM will only support wind energy facilities aligned with the said strategy.</p> <p>Most of the farm is considered a Critical Biodiversity Area in terms of CapeNature's Fine Scale Biodiversity Map for Saldanha Bay area. Due consideration should thus be taken regarding the location of wind turbines. Biodiversity should not be compromised.</p> <p>The following should be addressed during the Environmental Impact Assessment:</p>	<p>Thank you for these comments. GIBB has identified the Western Cape Provincial Spatial Development Framework as one the planning documents applicable to the project (Chapter 5, Section 5.2.4 of the Scoping Report). The PSDF and its objectives will be considered further in the Impact Assessment phase of the project together with all other applicable legislation and planning documents and provided to each of the specialists appointed for the project for consideration and comment in their detailed EIA phase report writing.</p> <p>The comment regarding the location within the Critical Biodiversity Area is noted and has been reported on accordingly within the Scoping Report. The significance of this will be assessed further within the EIA phase of the project through the ecological specialist study.</p> <p>Specialist specific concerns will be addressed through the specialist studies employed for the proposed</p>



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				<ul style="list-style-type: none"> • Visual Impacts should be assessed. Photographs of the site, with superimposed images of wind turbines, should be made available to interested and affected parties to enable them to make informed decision regarding the visual impact of the proposed facility, especially since the site is located on Patryberg, the highest point on this peninsula. • Noise impacts should be assessed and receive attention during the construction and operational phase. • An EMP must be compiled detailing inter alia, how issues such as dust suppression, noise control, storage and disposal of general and hazardous waste, as well as the provision of ablution and other facilities will be dealt with, especially during the construction phase. • A copy of the RoD and EMP must be submitted to this Municipality to facilitate monitoring of the construction and operational phases of the development by the Environmental Health Division. <p>The provisions of the Land Use Planning Ordinance (Ord 15 of 1985) must be adhered to prior to any development taking place.</p>	<p>project. All comments / recommendations provided will be forwarded to the specialist accordingly to address in their detailed studies within the EIA phase of the project.</p> <p>As requested, a copy of the RoD (now referred to as the Environmental Authorisation) and Environmental Management Plan (EMP) will be provided to your department accordingly once received and complete.</p>

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<p>Andrew Hall</p> <p>Chief Executive Officer Heritage Western Cape</p>	<p>Comments on Draft Scoping Report</p>	<p>9 May 2011</p>	<p></p>	<p>It was noted that:</p> <ul style="list-style-type: none"> • The application is for a Wind Energy Facility, consisting of 10 to 35 turbines and their associated infrastructure over 744 ha. • The Scoping Report indicates that an HIA will be completed for the EIA phase including: <ul style="list-style-type: none"> ○ A filed survey to determine the impacts on heritage resources. ○ Recommendations for mitigation of any impacts. ○ Mitigation may include test excavations • Langeklip farmstead and graveyard, part of the 18th C loan farm, falls within the proposed area. • The turbines will be visible from Vredenburg and the R399. • The anticipated impact on paleontological resources is minimal, however impacts on archeology are likely to be high. • The WEF will be in direct line of sight from the east, south and west and will be situated in one of the highest points in the study area. <p>It was agreed that:</p> <p>An integrated Heritage Impact Assessment is required consisting of</p>	<p>Comments noted.</p> <p>As agreed, the detailed Heritage Impact Assessment within the EIA phase of the project will address a specialist archaeology study, a specialist's desktop paleontological study and specialist study on structures.</p>

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				specialist archeological study, a specialist desktop paleontological study and a specialist study on the structures that may be impacted by the development as well as a visual impact study with an integrated set of heritage recommendations.	
Alana Duffell-Canham Scientific Services: Cape Nature	Comments on Draft Scoping Report	12 April 2011		<p>CapeNature would like to thank you for the opportunity to comment on the proposed Wind Energy Facility and wish to make the following comments:</p> <ol style="list-style-type: none"> 1. CapeNature supports the development of renewable energy facilities, including wind turbines. However, it must be recognised that the potential impacts on biodiversity of this relatively new technology are not yet fully understood in South Africa. We are concerned that the cumulative impacts of these facilities, if not properly considered and planned for, could be quite significant. It is therefore essential that a precautionary approach is taken and that turbines are placed outside of ecologically sensitive areas. It is also vital that a clear monitoring and reporting protocol is put in place so that lessons learned from newly established facilities can be shared with the wider community. 2. The site is covered mostly by Saldanha Granite Strandveld, which 	<ol style="list-style-type: none"> 1. Comment noted. 2. Comment noted. A landcover map of the study area indicates that a significant proportion of the site consists of cultivation. Based on these sources, it is probable that the study area has been impacted upon by cultivation and that any remaining vegetation is possibly not in pristine condition. Currently the proposed placement of the turbines is planned to be on those areas of the farm which were previously used for cultivation but which did not succeed and is now considered as fairly degraded land. The EIA will aim to ensure, as far as possible, that placement of the turbines within protected vegetation or vegetation of high importance will not take place. 3. Comment noted. Please refer to point 2 above. 4. Comment noted. Avifauna concerns will be addressed through the specialist study employed for the proposed project. All comments


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				<p>is considered to be an endangered vegetation type. Although parts of the site along the eastern and western edges have been transformed by agriculture, the centre of the site has been mapped as a CBA because of the endangered vegetation type and the presence of rare and endangered plant species.</p> <p>3. The loss of any of the natural vegetation remaining on site can be considered to have a high negative impact. No turbines, substations, roads, cable trenches and other associated infrastructure should be placed within any natural vegetation or within or near any wetlands, streams or rivers.</p> <p>4. In light of the many other applications on and near the West Coast Peninsula, cumulative impacts are of huge concern. Already a large facility on properties immediately west of this application has obtained environmental authorisation and another facility immediately to the east is in the process of applying for environmental authorisation. Such a large number of turbines across a section of landscape in an area such as this, where birds are known to commute regularly and in large numbers between the Berg River and Langebaan Lagoon, could provide a</p>	<p>/ recommendations provided will be forwarded to the specialist accordingly to address in their detailed study within the EIA phase of the project.</p> <p>5. Comment noted. A detailed layout of the identified locations for the turbines, and as commented on by the specialist studies will be provided within the draft EIA Report for public review.</p> <p>6. Comment noted. Please see item 4 above.</p> <p>7. Concerns with regards to avifauna will be addressed through the specialist study employed for the proposed project. The issue of bird monitoring programmes and relevant mitigation measures are well known by GIBB, the specialist and the developer, and those measures legally required will be undertaken accordingly.</p> <p>8. Comment noted. Please see item 5 above.</p>

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				<p>serious obstacle to birds.</p> <p>5. Once detailed specialist studies have been conducted and areas of high sensitivity have been determined by all specialists, an amended layout must be produced which indicates the exact locations of the proposed turbines and associated infrastructure and absolute no-go areas.</p> <p>6. Potential impacts on birds and bats are of high concern and there are several important bird species known to occur in the area. As noted above, we have very little idea of the impact that wind turbines could have on the avifauna particular to the region.</p> <p>7. Given the high levels of uncertainty, we are of the opinion that it would be desirable to base this impact assessment on detailed site visits and specialist assessment conducted over an entire year. The information from these studies will allow for flight paths and habitat preferences to be determined and will provide a degree more clarity and certainty with regards to the likely impacts and mitigation measures required. Monitoring should be undertaken according to the best practice guidelines currently being developed for bats and birds (Birdlife South Africa).</p> <p>8. Once specialist input has informed a</p>	

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				<p>final proposed layout, this must be provided in the EIR. The applicant and consultants must demonstrate how all recommendations and mitigation measures proposed by the specialists have been taken into consideration. Where impacts are considered to be unavoidable, this should be clearly stated and motivated.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
Issues and concerns raised during the Draft EIA Report Review Period					
<p>Laingville Community Members</p> <p>(Refer to comment sheets attached behind)</p>	Comments on Public Open Day	29 Nov 2011		<p>Would like more power and energy.</p> <p>Would want investments and profits to be distributed equally to the community for all to benefit.</p> <p>Would like the youth to become more involved and offered jobs to grow their skills.</p>	<p>These comments have been noted and captured accordingly.</p> <p>All comment sheets received have been added behind this IRR for review.</p>
<p>Alana Duffell-Canham</p> <p>Scientific Services: Cape Nature</p>	Comments on Draft EIA Report	09 Dec 2011		<p>CapeNature would like to thank you for the opportunity to comment on the proposed Wind Energy Facility and wish to make the following comments:</p> <p>1. The site is covered mostly by Saldanha Granite Strandveld, which is considered to be an endangered vegetation type. Although parts of the site along the</p>	<p>Arcus GIBB (Pty) Ltd would like to thank CapeNature for their comments and continued interest in the project. These comments have been noted and captured accordingly for decision-making, in particular the suggested mitigation measures.</p>

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				<p>eastern and western edges have been transformed by agriculture, the centre of the site has been mapped as a Critical Biodiversity Area (CBA) because of the endangered vegetation type and the presence of rare and endangered plant species. We are pleased to note that the report acknowledges the high occurrence of red list plant species and the high conservation value of the natural vegetation remaining on site and this must be protected. We support this part of the property potentially being entered into a stewardship agreement, dependant on capacity. If stewardship is to be considered as a mitigation measure, discussions must be entered into with CapeNature before submission of the final EIR. Rhett Smart of the Cape West Coast Biosphere Reserve (CWCBR) represents CapeNature's stewardship programme in this area and is the person to contact in this regard. The level of stewardship that the site qualifies for will need to be decided by the relevant stewardship committee.</p> <p>2. We maintain that the loss of any of the natural vegetation remaining on site can be considered to have a high negative impact. Turbines 6 and 8 should be located further south-west. Powerline route option 1 is preferred as it will have the least impact on natural vegetation and</p>	

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				<p>aquatic environments. A botanical assessment in the flowering season must be conducted of each footprint of the wind turbines and powerline. Plant species of conservation importance should be avoided – note that CapeNature does not consider search and rescue to be adequate mitigation. If micro-siting of turbines and associated infrastructure does not result in avoidance of these plant species, then the layout should be completely amended.</p> <p>3. Roads and cables should avoid crossing any rivers or wetlands on site. It is not clear from the information provided which roads are existing, which will need to be upgraded and where new roads will be required.</p> <p>4. Bird and bat monitoring must be conducted over an entire year. The information from these studies will allow for flight paths and habitat preferences to be determined and will provide a degree more clarity and certainty with regards to the likely impacts and mitigation measures required. The applicant should consider monitoring and use of radar in collaboration with other wind energy applicants in the region. Note that monitoring data may also lead to the need for an amended layout where some turbines may need to be relocated or</p>	

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				<p>even removed such as (possibly) turbine 3 which has already been determined to have a potential negative impact on slope soaring bird species.</p> <p>5. Construction areas must be fully rehabilitated post construction, with input from a relevant specialist.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	
<p>Mr Zaahir Toefy</p> <p>Western Cape Department of Environmental Affairs and Development Planning (WC DEA&DP)</p>	Comments on Draft EIA Report	08 Dec 2011		<p>This Directorate has the following comments:</p> <p>1. Alternatives</p> <p>The consideration of alternatives is inadequate. Based on the information provided in the Biodiversity Assessment Report (dated 11 November 2011 and compiled by David Hoare Consulting CC) the proposed site is located within a terrestrial and aquatic Critical Biodiversity Area (CBA). However, two wind turbines and internal roads will be located within the CBA. No alternatives with respect to the layout of the wind turbines and internal roads have been investigated to avoid any negative impacts on the CBA. These issues must be addressed in the final EIAR. In addition, the construction of new roads must be minimized and roads</p>	<p>Arcus GIBB (Pty) Ltd would like to thank WC DEA&DP for their comments and continued interest in the project. These comments have been noted and captured accordingly for decision-making, in particular the suggested mitigation measures.</p> <p>With regards to the placement of Turbines 6 and 8 within the CBA, the specialist has noted quite specifically the following mitigation measures:</p> <p>(1) A preconstruction survey for threatened and near threatened plant species must be undertaken at the location of turbines 7, 6 and 8 and in natural areas within 200 m of turbines 5 and 3 to determine</p>

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				<p>must be designed in such a way that it inflicts minimal negative impacts on any sensitive vegetation.</p> <p>It must be noted that the identification of feasible and reasonable alternatives is inextricably linked to the impacts identified in the process as well as the issues identified. Alternatives, which mitigate these impacts, therefore are required. Each alternative must be assessed against the potential impact identified in the process. In addition, each of these alternatives must consider the construction phase impacts as well as the direct and indirect cumulative impacts. The final EIAR must identify and report on alternatives that will avoid sensitive areas with respect to the above.</p> <p>A full explanation must be provided for each alternative with a substantiated motivation as to why the preferred alternative is considered as the most feasible and reasonable alternative for the proposed development.</p> <p>2. Access Roads</p> <p>Existing access roads must be used as far as possible. All non-permanent roads must be rehabilitated once the construction phase is completed. If permanent access roads are constructed,</p>	<p>whether any species of conservation concern occur there or not. The botanical survey must take place during the flowering time of the species concerned, which may require more than one field survey.</p> <p>(2) If any species of concern occur there, infrastructure must be moved to a locality where such populations would not be disturbed or the affected infrastructure must not be built.</p> <p>(3) A minimum buffer zone of 100 m should be maintained around such populations</p> <p>Due to the nature of the vegetation on site being largely degraded due to repeated and varied past agricultural practices on the farm, and the actual presence of such Strandveld CBA (as delineated by the CBA map) species are not necessarily as per the CBA map. It has been recommended that upon final design of the turbine layout, these areas be visited specifically again to guide placement accordingly as to not impact on species of concern.</p> <p>Alternative options to place the turbines</p>

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				<p>these roads must be limited to gravel surfaces only. In addition, abnormal heavy load trips associated with transport of the turbine components and equipment to site will occur. The Department therefore recommends that a road maintenance plan be compiled and implemented to minimize damage and maintain the roads for the period that they will be required. This must be compiled prior to the commencement of construction activities.</p> <p>3. All areas outside the development footprint that are disturbed during construction must be rehabilitated and re-vegetated to prevent erosion on completion of the construction phase.</p> <p>4. The Draft Environmental Management Programme (EMP) to be submitted as part of the final EIAR must include a stormwater management plan to prevent erosion. The stormwater management plan must clearly indicate how sedimentation from runoff will be reduced and prevented from entering the watercourses.</p> <p>5. You are advised to obtain comment from this Departments Directorate: Pollution Management (Contact Person Ms J. Leaner – 021 483 2798) with respect to noise impacts as a result of the</p>	<p>south west of the proposed locations unfortunately became null and void due to the Land Use Ordinance Planning Act, whereby a turbine has to be placed 1 and a half times tips height from the boundary of a farm.</p> <p>Stormwater management and erosion control has been included within section 6.4.14 of the draft EMP.</p> <p>GIBB will endeavour to solicit comments where requested and forward to the Department of Environmental Affairs accordingly.</p>

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				<p>proposed development and noise regulation which must be submitted together with the final EIAR</p> <p>You are required to quote the above-mentioned reference number in any future correspondence in respect of the proposed development.</p> <p>This Department reserves the right to revise or withdraw any comments or request further information from you based on any information that might be received.</p>	